



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

October 17, 1994



HSRM-6J

RE: Granville Solvents Superfund Site, OH

Dear [REDACTED]:

This letter provides a response to certain questions you raised at the September 14, 1994 public meeting in Granville OH, regarding the Granville Solvents Superfund Site. Specifically, you raised questions regarding how lender liability is addressed under Superfund; at the meeting I agreed to send you additional information once gathered. Enclosure 1 to this letter provides a copy of EPA's Lender Liability Rule under Superfund (4/29/92 Federal Register, Vol. 57 No. 83, at page 18344). You should be aware that the courts have invalidated this rule since it was published on 4/29/92 in a decision cited as Kelley v. EPA; however, it remains EPA's current practice to follow this rule. Also, enclosed for your information is a copy of my 9/29/94 letter to Mr. Plunkett, which provided a response to questions raised at the 9/14/94 meeting. You will note that comment response #8 discusses this issue.

I trust this letter provides an adequate response to the issues you raised at the public meeting. Please contact me at (312) 353-9228 if you have any other questions or need any additional information.

Sincerely,

Edward J. Hanlon

Enclosures

CC (Cover Letter Only): Mike Anastasio, ORC
Joe Fredl, OSC
Fred Myers, OEPA

03V-3.107